

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TERRA FIRMA INVESTMENTS (GP) 2 LIMITED,
and TERRA FIRMA INVESTMENTS (GP) 3
LIMITED,

Plaintiffs,

-against-

CITIGROUP INC., CITIBANK, N.A., CITIGROUP
GLOBAL MARKETS LIMITED and CITIGROUP
GLOBAL MARKETS INC.,

Defendants.

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Case No. 09 CIV 10459
(JSR) (AJP)
ECF Case

**NOTICE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
PURSUANT TO RULE 56 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

PLEASE TAKE NOTICE THAT Defendants Citigroup Inc., Citibank, N.A., Citigroup Global Markets Limited, and Citigroup Global Markets Inc. ("Defendants") hereby move this Court before the Honorable Jed S. Rakoff, United States Courthouse, 500 Pearl Street, Room 14B, New York, New York 10007, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Defendants' motion for summary judgment. By direction of the Court, opposition papers shall be served on or before August 27, 2010, reply papers shall be served on or before September 3, 2010, and oral argument is scheduled for September 10, 2010, at 4:00 p.m.

Dated: New York, New York
August 13, 2010

Respectfully Submitted,

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Global Markets Limited, and Citigroup Global Markets Inc.*